

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON)
TALCUM POWDER PRODUCTS)
MARKETING, SALES PRACTICES AND)
PRODUCTS LIABILITY LITIGATION)

MDL Docket No. 2738

This Document Relates To All Cases)
_____)

SUPPLEMENTAL CERTIFICATION OF JULIE L. TERSIGNI

1. I am an attorney at law of the State of New Jersey and am an associate of the law firm of Drinker Biddle & Reath LLP, attorneys for Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc., formerly known as Johnson & Johnson Consumer Companies, Inc. I submit this Certification based on personal knowledge in further support of Defendants' Omnibus to Exclude the Opinions of Plaintiffs' Experts for General Causation *Daubert* Hearing; Defendants' Opposition to Plaintiffs' Steering Committee's Omnibus Brief Regarding *Daubert* Legal Standard and Scientific Principles for Assessing General Causation; Defendants' Opposition to Plaintiffs' Motion to Exclude the Opinions of Defendants' Epidemiology Experts; Defendants' Opposition to Plaintiffs' Steering Committee's Motion to Exclude the Geology Opinions of Drs. Mary Poulton and Laura Webb; Defendants' Opposition to Plaintiffs' Motion to Exclude the Opinions of Robert

Kurman, M.D.; Defendants' Opposition to Plaintiffs' Motion to Exclude the Opinions of Defendants' Molecular Biologists Drs. Neel, Shih, Boyd and Birrer; Defendants' Opposition to Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Defendants' Experts Brooke T. Mossman, M.S., Ph.D., Kelly S. Tuttle, Ph.D., and H. Nadia Moore, Ph.D.; Defendants' Opposition to Plaintiffs' Steering Committee's Motion to Exclude the Opinions and Testimony of Defendants' Experts Dr. Cheryl Saenz and Dr. Kevin Holcomb; and Defendants' Opposition to Exclude the Geological Testing Opinions of Drs. Ann G. Wylie and Melinda Darby Dyar.

2. Attached hereto are true and correct copies of the following exhibits:

Section A: Scientific Studies, Editorials and Other Articles (cont.)	
Exhibit No.	Description
A160	Benjamin et al., <i>Redefine Statistical Significance</i> , 2 Nature Human Behaviour 6 (2018)
A161	Chawla, <i>The Undercover Academic Keeping Tabs On 'Predatory' Publishing</i> , Nature, Mar. 16, 2018, https://www.nature.com/articles/d41586-018-02921-2
A162	Choi et al., <i>Risk Factors for Elizabethkingia Acquisition and Clinical Characteristics of Patients, South Korea</i> , 25(1) Emerging Infectious Diseases 42 (2019)
A163	Demb et al., <i>Optimizing Radiation Doses for Computed Tomography Across Institutions</i> , 177(6) JAMA Internal Med. 810 (2017)
A164	Godard et al., <i>Risk Factors for Familial and Sporadic Ovarian Cancer Among French Canadians: A Case-Control Study</i> , 179 Am. J. of Obstetrics & Gynecology 403 (1998)
A165	Hall, <i>Sealed Cache of Moon Rocks to Be Opened by NASA</i> , N.Y. TIMES, March 13, 2019

Section A: Scientific Studies, Editorials and Other Articles (cont.)	
Exhibit No.	Description
A166	Int'l Org. for Standardization, <i>Ambient Air – Determination of asbestos fibers – Indirect-transfer transmission electron microscopy method</i> (1999)
A167	King et al., <i>A Trial of a Triple-Drug Treatment for Lymphatic Filariasis</i> , 379 New England J. of Med. 1801 (2018)
A168	Krewer & Millette, <i>Asbestos Analysis by Transmission Electron Microscopy In-House Training</i> , 38 The Microscope 97 (1990)
A169	Mason et al., <i>Vitamin D₃ Supplementation During Weight Loss: A Double-Blind Randomized Controlled Trial</i> , 99 Am. J. Clin. Nutr. 1015 (2014)
A170	Moorman et al., <i>A Prospective Study of Weight Gain After Premenopausal Hysterectomy</i> , 18 J. of Women's Health 699 (2009)
A171	Newbury & Ritchie, <i>Performing elemental microanalysis with high accuracy and high precision by scanning electron microscopy</i> , J. Mater. Sci 5 (2015)
A172	Tisminetzky et al., <i>Magnitude and Impact of Multiple Chronic Conditions with Advancing Age in Older Adults Hospitalized with Acute Myocardial Infarction</i> , 272 Int'l J of Cardiology 341 (2018)
A173	Wells et al., <i>The Newcastle-Ottawa Scale (NOS) for assessing the quality of nonrandomised studies in meta-analyses</i> , The Ottawa Hospital, http://www.ohri.ca/programs/clinical_epidemiology/oxford.asp (last visited May 23, 2019)
A174	Wise, et al., <i>Effect of Acridinium Bromide on Major Cardiovascular Events and Exacerbations in High-Risk Patients With Chronic Obstructive Pulmonary Disease: The ASCENT-COPD Randomized Clinical Trial</i> , 321(17) JAMA 1693 (2019)
A175	Wong et al., Fed. Judicial Ctr., <i>Reference Guide on Medical Testimony</i> , in <i>Reference Manual on Scientific Evidence</i> 687 (3d ed. 2011)
A176	Wong et al., <i>Perineal Talc Exposure and Subsequent Epithelial Ovarian Cancer: A Case-Control Study</i> , 93 Obstetrics & Gynecology 372 (1999)

Section A: Scientific Studies, Editorials and Other Articles (cont.)	
Exhibit No.	Description
A177	Woolson & Kleinman, <i>Perspectives On Statistical Significance Testing</i> , 10 Ann. Rev. Pub. Health 423 (1989)
A178	Wylie & Candela, <i>Methodologies for Determining the Sources, Characteristics, Distribution, and Abundance of Asbestiform and Nonasbestiform Amphibole and Serpentine in Ambient Air and Water</i> , 18 J. Tox. & Env't'l Health 1 (2015)
A179	Wylie et al., <i>Measurement of the Thickness of Amphibole Asbestos Fibers with the Scanning Electron Microscope and the Transmission Electron Microscope, Microbeam Analysis</i> (K.F.J. Heinrich ed. 1982)
A180	Wylie, <i>Amphibole Dusts: Fibers, fragments and mesothelioma</i> , 54 Canadian Mineralogist 1403 (2016)
A181	Wylie, <i>Asbestos and Fibrous Erionite, in Asbestos and Mesothelioma</i> 11 (Joseph Testa ed. 2017)
A182	Wylie, <i>Modeling Asbestos Populations: The Fractal Approach</i> , 30 Canadian Mineralogist 437 (1993)

Section B: MDL Depositions and Exhibits ¹ (cont.)	
Exhibit No.	Description
B50	Deposition of Patrick Downey, Aug. 7, 2018
B51	Deposition of Patrick Downey, Aug. 8, 2018

Section D: Produced Documents (cont.)	
Exhibit No.	Description
D8	IMERYS 219720

¹ Relevant testimony in deposition transcripts is highlighted for the Court.

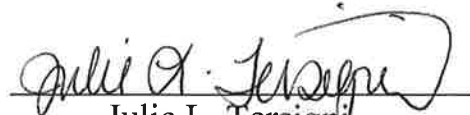
Section E: Non-MDL Depositions, Transcripts, Expert Reports and Court Filings² (cont.)	
Exhibit No.	Description
E32	Excerpts of Deposition of Fred Pooley, Ph.D., <i>Ratcliff v. Borg-Warner Corp.</i> , No. 16-2-18128-7 (Wash. Super. Ct. Feb. 1, 2018)
E33	Excerpts of Deposition of William E. Longo, Ph.D., <i>Lanzo v. Cyprus Amax Minerals</i> , No. MID-L-7385-16 AS (N.J. Super. Ct. Oct. 24, 2017)

Section J: Miscellaneous: Other Documents	
Exhibit No.	Description
J1	7272 <i>Darbydyar</i> (1980 DD1), NASA Jet Propulsion Laboratory, https://ssd.jpl.nasa.gov/sbdb.cgi?sstr=7272
J2	Ann Wylie Final Summary, JIFSAN (Nov. 28, 2018)
J3	Asbestos in Talc Symposium, Participant List, JIFSAN (Nov. 28, 2018)
J4	Asteroids Carry Mount Holyoke Names, Mount Holyoke, https://www.mtholyoke.edu/media/asteroids-carry-mount-holyoke-names
J5	<i>Beall's List of Predatory Journals and Publishers</i> , https://beallslist.weebly.com/ (last updated May 20, 2019)
J6	Email from Dr. William E. Longo, Ph.D., President of MAS, to Jerome H. Block, Partner at Levy Konigsberg, LLP (Mar. 7, 2018, 03:22PM EST)

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

² Relevant testimony in deposition transcripts is highlighted for the Court.

Dated: May 29, 2019


Julie L. Tersigni